

NOTAM KICZ A0029/21 – PACTEC Relief Request

- 1) Your name and mailing address and, if you wish, other contact information, such as a fax number, telephone number, or e-mail address. (The FAA may need to contact you if it has questions about your request or needs additional information.)

Stanley R. Unruh
Agent for Service/Deputy Director of Operations
PACTEC International
P.O. Box 28
Nampa, ID 83653
Cell: Redacted by applicant
Telephone: Redacted by applicant
Fax: redacted by applicant
e-mail:

- 2) A statement that you seek relief from NOTAM KICZ A0029/21.

PACTEC is formally requesting the FAA for relief from NOTAM KICZ A0029/21 due to the ongoing humanitarian efforts by over 100 non-government organizations (NGO) that are registered to use PACTEC's flight service.

- 3) The extent of relief you seek, and the reason you seek the relief.

PACTEC requests the following:

- Approval to resume operations in the Kabul FIR from December 1st onward.

- 4) The reasons why granting your request would be in the public interest; that is, how it would benefit the public as a whole.

PACTEC has many years of experience providing air service to humanitarian, relief and development agencies in Afghanistan.

- The European Union and the Swiss Government presently partner with PACTEC in financially underwriting the costs of the humanitarian flight services. Those two entities are requesting PACTEC make every effort to resume operations thereby allowing numerous aid agencies to resume their aid missions in remote districts of Afghanistan. A number of aid agencies have indicated a reluctance to resume humanitarian aid in some locations unless PACTEC resumes operations. They consider PACTEC's record of reliable operations a crucial element of their ability to deploy staff to some locations.

5. The reasons why granting relief would not adversely affect safety, or how providing the relief would provide a level of safety at least equal to that provided by NOTAM KICZ A0029/21.

NOTAM KICZ A0029/21 issued by the FAA attempts to provide the highest level of safety to the aviation public by prohibiting operations within the Kabul FIR. PACTEC maintains that security protocols described under number 8 through 10 of this document provides an acceptable measure of security thereby warranting relief by the FAA.

PACTEC and its parent organization have more than 70 years of experience operating in challenging environments in the developing world. PACTEC has made the safety of our pilots and passengers the highest priority.

We believe our security protocols, cultivated from years of operating in Afghanistan, provide a level of operational safety that warrants relief from the requirements found in NOTAM KICZ A0029/21.

6. The proposed operation(s), including the nature of the operation and the date(s) of the proposed operations.

PACTEC has safely and consistently operated in Afghanistan as a humanitarian aviation organization for many years. The operations are supported by the Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) subsidies. Routine audits

for safety, quality, and financial management are a part of our professional approach to PACTEC operations. PACTEC has an agreement with the Civil Aviation Authority of Afghanistan to operate in the country. Over the years, we have partnered with hundreds of NGO's and flown thousands of hours to provide relief and medical evacuations in support of the Afghan people.

Our operations rely on three Daher Kodiak 100's to safely transport workers to many parts of Afghanistan, helping them overcome the constraints of time, inhospitable terrain, and roads that are insecure. We intentionally developed and matured flight operations that are uniquely positioned and specifically suited for the challenges that are inherent to Afghanistan. The service we provide is often the only air service able to assist and support workers in the most remote regions of Afghanistan.

It is our desire to resume operations in an effort to assist other aid organizations head off the impending humanitarian disaster that is unfolding as winter sets in. As we have lived and worked alongside our national colleagues, we have come to understand the fluidity of life in Afghanistan and the complexity of the current situation. We request the FAA weigh the risk of flight operations as we have proposed them against the risk humanitarian workers face traveling via ground transport against the humanitarian catastrophe that will unfold if aid agencies are unable to operate.

7. The service to be provided by the person(s) covered by NOTAM KICZ A0029/21, from which you seek relief. –

PACTEC is requesting the approval to resume operations of three Daher Kodiak 100's in accordance with our current security protocols outlined below. The service we are providing is safe and reliable air transportation for the many NGO's and humanitarian organizations who work in Afghanistan.

8. The method by which the operator will obtain current threat information, and an explanation of how the operator will integrate this information into all phases of its proposed operations (i.e., the pre-mission planning and briefing, in-flight, and post-flight phases).

PACTEC has established a robust network from which it obtains intelligence/threat information. The primary sources through which PACTEC obtains this information are the following:

- i. INSO (International NGO Safety Organization) – INSO is an international organization that supports the safety of aid workers in high-risk contexts through providing accurate and relevant security related information. Afghanistan is one of 14 countries in which INSO is active. The following shows the primary INSO services which PACTEC uses:
 - a. INSO provides a 24/7 Flash Alert through which security incidents are reported (normally within minutes)
 - b. INSO tracks security incidents
 - c. INSO provides security analysis reports
 - d. INSO provides direct access to regional Safety Advisors
- ii. UNHAS – An MOU is established between PACTEC and this U.N. program to share sensitive/confidential security information with each other.
- iii. ICRC (International Committee of the Red Cross) – PACTEC has an established relationship with ICRC. PACTEC and ICRC share security related information as we operate in many of the same areas.
- iv. ACAA (Afghanistan Civil Aviation Authorities) – PACTEC has direct access to the ACAA from which it can obtain certain threat information.
- v. Airport Management – PACTEC requires direct contact with airport management for current threat information 15 minutes prior to landing.
- vi. Local assets – PACTEC has established a robust network of vetted individuals at the various airports/airstrips where PACTEC operates. Through these sources we obtain accurate and current threat information.

As PACTEC pro-actively manages security there is systematic integration of all the obtained security/threat information in its operations in the following ways:

- i. Pre-mission and briefing
 - a. Risk assessments - With the obtained information the PACTEC security team makes risk assessments for every airport where PACTEC operates. The level of risk is re-evaluated daily. Mitigation actions are taken to obtain an acceptable

residual risk. To date, PACTEC has not had a single incident of aircraft damage due to small arms fire.

- b. Pre-departure security check – Before an aircraft is dispatched, the PACTEC security team establishes contact with airport management/local assets for a current security update. Other established sources may also be consulted prior to dispatching an aircraft.
- c. Pre-flight crew briefing – The PACTEC security team uploads the following security information unto the Electronic Flight Bag that each crew member is required to read prior to dispatch.
 - i. Airport Risk level
 - ii. Identified risks and the required mitigation actions for the specific mission
 - iii. Parts on the routing where low overflight is to be avoided
- ii. In-flight
 - a. The route and altitude of a specific mission is dependent upon current security information, with flight altitudes used to avoid being within firing range of weapons available to extremists and militants.
 - b. Security descents are done to avoid low flight over higher-risk areas. (A security descent is a procedure to descend while directly overhead a secure airport)
 - c. Each aircraft is continuously tracked through satellite tracking.
 - d. The flight crew maintain continuous satellite communication with PACTEC flight tracking staff.
 - e. Prior to landing at high-risk airports, the PACTEC security team will make a final security assessment =< 15 prior to landing. Without the PACTEC security team giving a landing clearance to the pilot, or when no ground contact can be established with our local assets or airport management, PACTEC crew will divert to an alternate site (normally home base).
- iii. Post-flight – The flight crew is debriefed after each mission. Any relevant information will be used to re-evaluate the risk level for the routes and airports. Any relevant information will be shared with other flight crew through the internal NOTAM system.

9. The operator's current assessment of the risk to its proposed civil flight operations in the Kabul FIR.

As a result of the mitigation actions taken by PACTEC and the security measures in place which are described under number 8 of this document the residual risk for flight within the Kabul FIR is assessed as acceptable. PACTEC has the following security measures in place to safeguard our operations.

- i. Security assessments are done by the PACTEC security team based on the best available and current intelligence.
- ii. Despite assurances by extremists that NGOs are not targets, we safeguard our operation by not allowing flight within firing range of weapons available to extremists/militants.
- iii. Prior to dispatching an aircraft, the crew is briefed on the most recent security information related to the specific mission. All relevant information is readily available to the crew through the use of the Electronic Flight Bag. Electronic Flight Bags are synchronized before every flight.
- iv. Satellite tracking and communication is a requirement for dispatching an aircraft. The security team continuously monitors the security status throughout any flight. When necessary, a PACTEC aircraft will be directed to return to home base through satellite communication.

10. The plans and procedures the operator will use to minimize the risks, identified in NOTAM KICZ A0029/21 from which you seek relief, to the proposed operations, to establish that granting the relief would not adversely affect safety or would provide a level of safety at least equal to that provided by the KICZ NOTAM from which you seek relief. The FAA has found comprehensive, organized plans and procedures of this nature to be helpful in facilitating the agency's safety evaluation of requests for relief from FAA flight prohibitions for overseas areas.

PACTEC maintains that security protocols described under number 9 and 10 of this document provides a comparable measure of security such that exist around Kabul, thereby warranting the granting of relief by the FAA. Here you will find a summary of the plans and procedures.

- i. Intelligence gathering through vetted sources
- ii. Daily risk assessments by the PACTEC security team
- iii. Pre-dispatch security check

- iv. Pre-flight security briefing for crew
- v. Mission-related security information always available to crew on the Electronic Flight Bag
 - a. In-flight procedures
 - b. Select flight altitudes and routes based on recent security information
 - c. Security descents
 - d. Satellite tracking and communication with crew
 - e. Security check ≤ 15 prior to landing
- vi. Crew de-brief

11. If the proposed operations will involve aircraft registered in the United States, the FAA aircraft registration number(s) of the aircraft.

Aircraft based in Afghanistan:

-Redacted by the applicant

13. The full name and airman certificate numbers of each airman who would be exercising the privileges of an airman certificate issued by the FAA in the conduct of the operation(s) for which you seek relief, if such relief is granted.

PACTEC Afghanistan crew:

-Redacted by the applicant

14) Any additional information, views or arguments available to support your request. If you seek expedited processing of your request for relief, the reason you seek expedited processing. (In addition, if you are seeking expedited processing, you will need to follow the steps listed in the "If you wish to request expedited consideration of your request for relief" section of this document below.)

In closing, PACTEC's security protocols are effective, evidenced by the many years of no security-related incidents.

Why consideration for relief is necessary:

1. There are NGO staff doing crucial humanitarian work for the Afghan people. Due to the humanitarian crisis that is unfolding, access to remote regions of Afghanistan is more critical now than ever. NGO workers have been living and working in these locations knowing that if security were ever in question, they could count on PACTEC air services to remove them to safety. PACTEC needs the option to provide these services.

2. PACTEC understands that the FAA's role is to guard the safety of passengers. An effort to quickly respond and allow PACTEC to move humanitarian workers in the safest manner possible, which is by air, and authorizing relief from the NOTAM contributes to the safety of aid workers that rely on PACTEC.